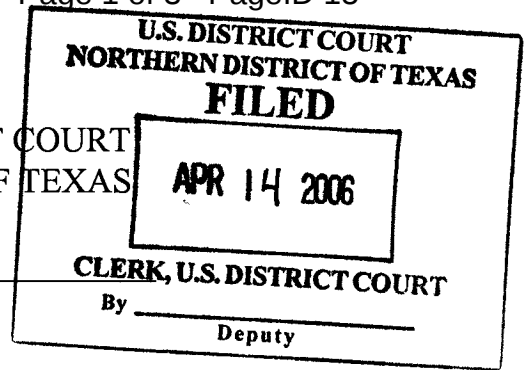


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



UNITED STATES OF AMERICA

V.

JONATHAN GEORGELAS

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Criminal No. 3:06-MJ-163

MOTION FOR DETENTION

The United States moves for pretrial detention of defendant, Jonathan Georgelas, pursuant to 18 U.S.C. §3142(E) and (f).

1. Eligibility of Case. This case is eligible for a detention order because case involves:

- ☐ Crime of violence (18 U.S.C. §3156);
- ☐ Maximum sentence life imprisonment or death
- ☐ 10 + year drug offense
- ☐ Felony, with two prior convictions in above categories
- ☒ Serious risk defendant will flee
- ☐ Serious risk obstruction of justice

2. Reason for Detention. The Court should detain defendant because there are no conditions of release which will reasonably assure:

- ☒ Defendant's appearance as required
- ☐ Safety of any other person and the community

3. Rebuttable Presumption. The United States (will, will not) invoke the rebuttable presumption against defendant because:

___ Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. §924(c)

___ Previous conviction for "eligible" offense committed while on pretrial bond

4. Time for Detention Hearing. The United States requests the Court conduct the detention hearing,

___ At first appearance

X After continuance of 3 days

5. Other Matters.

DATED this 14th day of April, 2006.

Respectfully submitted,

RICHARD B. ROPER
UNITED STATES ATTORNEY



LINDA C. GROVES
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214.659.8631

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Motion has been served upon the defendant or his counsel of record in accordance with the provisions of Rule 49 F.R.Cr.P.

DATED this 14th day of April, 2006.

A handwritten signature in cursive script, appearing to read "Linda C. Groves", is written above a horizontal line.

LINDA C. GROVES
Assistant United States Attorney